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6 *Attorneys for Plaintiffs,*  
7 CANTERS DELI LAS VEGAS, LLC and  
CANTERS DELI TIVOLI VILLAGE LLC

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 CANTERS DELI LAS VEGAS LLC, a citizen  
11 of the state of California; and CANTERS  
DELI TIVOLI VILLAGE LLC, a citizen of the  
State of California,

12 *Plaintiffs,*

13 v.

14 BANC OF AMERICA MERCHANT  
15 SERVICES, LLC, a citizen of the States of  
Delaware and Georgia; BANK OF AMERICA,  
16 N.A., a citizen of the State of North Carolina;  
FREEDOMPAY, INC., a citizen of the States  
17 of Delaware and Pennsylvania; and DOES 1  
through 10,

18 *Defendants.*

19 CASE NO.: 2:18-cv-01908-KJD-NJK

20 **STIPULATION AND [PROPOSED]  
ORDER TO EXTEND RESPONSE AND  
REPLY DEADLINES IN  
CONNECTION WITH DEFENDANT  
FREEDOMPAY, INC.'S MOTION TO  
DISMISS OR, IN THE ALTERNATIVE,  
TO TRANSFER VENUE TO THE  
EASTERN DISTRICT OF  
PENNSYLVANIA**

21 **[SECOND REQUEST]**

22 Plaintiffs CANTERS DELI LAS VEGAS LLC and CANTERS DELI TIVOLI VILLAGE  
23 LLC (together, "Canters"), and Defendant FREEDOMPAY, INC. ("FreedomPay"), by and  
24 through their undersigned counsel of record, hereby stipulate and agree to extend the reply  
25 deadline in connection with Defendant FreedomPay, Inc.'s Motion To Dismiss or, in the  
Alternative, to Transfer Venue to the Eastern District of Pennsylvania filed on November 8, 2018  
("Motion to Dismiss"), as follows:

26 WHEREAS, the parties previously agreed to extend the response and reply deadlines  
27 associated with the Motion to Dismiss (*see* ECF No. 17);

28 WHEREAS, due to a clerical error, the stipulation submitted to the Court erroneously

1 identified the reply response as December 10, 2018, instead of December 17, 2018, as the parties  
2 agreed. The Court then granted the stipulation, such that the current deadline is currently set for  
3 December 10, 2018 (*see* ECF No. 18); and

4 WHEREAS, the parties therefore seek the Court's approval to extend the deadline for  
5 FreedomPay to file its reply in support of its Motion to Dismiss, and this is their second request.

6 THEREFORE, in consideration of the foregoing, the parties request that the Court modify  
7 the briefing schedule, as follows:

8 2. That the deadline for FreedomPay to file a reply in support of FreedomPay's  
9 Motion to Dismiss is extended up to and including **December 17, 2018**.

10  
11 DATED this 4<sup>th</sup> day of December, 2018

12 BROWNSTEIN HYATT FARBER  
13 SCHRECK, LLP

14 By: /s/ Adam K. Bult

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18 *Attorneys For Plaintiffs,*  
19 *CANTERS DELI LAS VEGAS, LLC and*  
*CANTERS DELI TIVOLI VILLAGE LLC*

10  
11 DATED this 4<sup>th</sup> day of December, 2018

12 GORDON REES SCULLY MANSUKHANI,  
13 LLP

14 By: /s/ Craig J. Mariam

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18 *Attorney for Defendant*  
19 *FREEDOMPAY, INC.*

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21  
22 IT IS SO ORDERED:  
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25  
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UNITED STATES DISTRICT JUDGE

Dated: December 12, 2018